
**IN THE UNITED STATES DISTRICT COURT FOR THE
MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION**

UNITED STATES OF AMERICA)	
)	
v.)	Case No.: 2:05-CR-258-F
)	
JASON JERNIGAN)	

**UNOPPOSED MOTION TO EXTEND TIME FOR FILING PRETRIAL
MOTIONS**

COMES NOW the Defendant, **JASON JERNIGAN**, by and through undersigned counsel and pursuant to 18 U.S.C. §§ 3161(h)(3)(A) and (B) and (h)(8)(A) and (B)(i) and (iv), and files this Unopposed Motion to Extend Time for Filing Pretrial Motions, requesting that the Court find that the ends of justice would be served by scheduling an additional pretrial conference and setting a new date for pretrial motions to accord with continuance of the trial of this case from the February 13, 2006, trial docket to the June 5, 2006, trial docket as requested in a companion motion.

In support of this motion, Mr. Jernigan would show the following:

1. Counsel for the prosecution does not oppose this motion.
2. This case is set for trial on February 13, 2006.
3. Pursuant to the arraignment order, and because of court holidays, pretrial motions are due by December 30, 2005.
4. The Assistant United States Attorney assigned to this case is currently out of the office and will not return until January 4, 2006.

5. Negotiations may make pretrial motions unnecessary.

6. Alternatively, several meritorious motions may be possible in this case, concerning a defect in the indictment and grounds for suppression of evidence.

7. Investigation of this case is not yet complete, as several witnesses have not been available to be interviewed by the defense.

8. The defense has requested state court documents which have not yet been received.

9. For the reasons set forth above, pursuant to 18 U.S.C. §§ 3161(h)(3)(A) and (B) and (h)(8)(A) and (B)(i) and (iv), this matter should be continued.

For the reasons set forth above, the defendant requests that a new date be set for pretrial motions and that an additional pretrial conference be scheduled in accordance with removal of this case from the February 13, 2006, trial docket to the June 5, 2006, trial docket, as requested in a companion motion.

Respectfully submitted,

s/Anne E. Borelli

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**FEDERAL DEFENDERS
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CERTIFICATE OF SERVICE

I hereby certify that on December 29, 2005, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following:

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